

June 28, 2021

**VIA ECF**

The Honorable Arlene M. Lindsay, U.S.M.J.  
United States District Court  
Eastern District of New York  
814 Federal Plaza  
Central Islip, New York 11722

**Re: Nesia Allen v. Lodging Solutions, LLC et al.,**  
**Docket No.: 2:20-cv-00859**

Dear Judge Lindsay:

This firm represents Defendant in connection with the above-referenced matter. We write, with consent of Plaintiff's counsel, to request an extension of time to submit the motion for judicial approval and the settlement agreement.

Currently, the motion for judicial approval and settlement paperwork are due on June 30<sup>th</sup>. While the terms of the settlement agreement are nearly finalized, the additional time is necessary to review the final agreement with our respective clients and fully execute same before submission. Prior to submitting this letter motion requesting a seven-day extension of time, until July 7<sup>th</sup>, we reached out to opposing counsel for their consent, which was initially provided for the seven (7) days. Shortly thereafter, however, Plaintiff's counsel retracted that consent and stated he would only agree to an extension of time until Friday, July 2<sup>nd</sup>, which is essentially a 2-day extension, with the due date being a Friday leading into a holiday weekend. Thus, at a minimum, an extension of time until Friday, July 2<sup>nd</sup> should be granted because that is what we presently have consent for. However, out of a courtesy and professionalism, we believe an extension of time until July 7<sup>th</sup> should be granted because that is what we initially had consent for. The additional time from July 2<sup>nd</sup> to July 7<sup>th</sup> is necessary because Plaintiff's counsel only provided us with a draft of the motion for judicial approval, proposed notice and proposed order for our review today at 3:46 p.m., which only allows for 48 hours to review, comment on same, present to our client, and get their approval. That is clearly an impossible task.

This is the Parties' second request for an extension of time to file the motion for judicial approval and corresponding settlement agreement. Defendant does not anticipate any further delay on this matter.

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We thank Your Honor for all courtesies extended.

Respectfully submitted,  
Kaufman Dolowich & Voluck, LLP



Erika Rosenblum